

**THE OFFICE OF REGULATORY STAFF**

**DIRECT  
TESTIMONY**

**OF**

**CHRISTOPHER J. ROZYCKI**

**DECEMBER 9, 2008**



**DOCKET NO. 2008-328-C**

**APPLICATION OF TIME WARNER CABLE INFORMATION  
SERVICES (SOUTH CAROLINA) LLC, D/B/A/ TIME WARNER  
CABLE TO AMEND ITS CERTIFICATE OF PUBLIC  
CONVENIENCE AND NECESSITY TO PROVIDE TELEPHONE  
SERVICES IN THE SERVICE AREA OF PBT TELECOM, INC. AND  
FOR ALTERNATIVE REGULATION**

1                                   **DIRECT TESTIMONY OF**  
2                                   **CHRISTOPHER J. ROZYCKI**  
3                                   **FOR**  
4                                   **THE OFFICE OF REGULATORY STAFF**  
5                                   **DOCKET NO. 2008-328-C**  
6                   **IN RE: APPLICATION OF TIME WARNER CABLE INFORMATION**  
7                   **SERVICES (SOUTH CAROLINA) LLC, D/B/A TIME WARNER CABLE TO**  
8                   **AMEND ITS CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**  
9                   **TO PROVIDE TELEPHONE SERVICES IN THE SERVICE AREA OF PBT**  
10                   **TELECOM, INC. AND FOR ALTERNATIVE REGULATION**

11

12   **Q.   PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND**  
13       **OCCUPATION.**

14   A.           My name is Christopher J. Rozycki and my business address is 1401 Main  
15               Street, Suite 900, Columbia, South Carolina 29201. I am employed by the State  
16               of South Carolina Office of Regulatory Staff (“ORS”) as a Program Manager in  
17               the Telecommunications Department.

18   **Q.   PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND**  
19       **BACKGROUND.**

20   A.           I have over 30 years of experience in business and government: more than  
21               20 years in telecommunications business and regulation; and nearly 10 years in  
22               the regulation of energy industries.



1 telecommunications entrants, regulation and oversight of existing  
2 telecommunications companies, management of the state universal service and  
3 Interim LEC funds, and administration of the Lifeline Program.

4 **Q. HAVE YOU PROVIDED TESTIMONY IN OTHER REGULATORY**  
5 **PROCEEDINGS?**

6 A. Yes. I have provided testimony on a variety of issues in Alabama,  
7 Delaware, Florida, Georgia, Louisiana, Mississippi, New York, North Carolina,  
8 Pennsylvania, South Carolina, Tennessee, Vermont, and Virginia. A list of the  
9 cases in which I have testified may be found in Exhibit CJR-2.

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
11 **PROCEEDING?**

12 A. The purpose of my testimony is to present ORS' recommendation on the  
13 application of Time Warner Cable Information Systems ("TWCIS" or  
14 "Applicant") to begin providing Digital Phone Service in the area currently served  
15 by PBT Telecom, Inc. ("PBT").

16 **Q. COULD YOU PLEASE SUMMARIZE YOUR TESTIMONY AND YOUR**  
17 **RECOMMENDATION?**

18 A. Yes. After reviewing the application of TWCIS for a certificate of public  
19 convenience and necessity ("CPCN") that would allow it to offer a new  
20 telecommunications service, called Digital Phone Service, over its existing Cable  
21 TV network infrastructure in the territory of PBT, I am recommending approval

of the TWCIS application. I have evaluated the TWCIS application and found that:

1. The applicant's previously approved CPCN (Docket No. 2003-362-C, Order No. 2004-213, May 24, 2004) demonstrated that it possesses technical, financial, and managerial resources sufficient to provide the services requested throughout the entire state of South Carolina;
2. TWCIS currently offers Digital Phone Service in select areas of South Carolina and it meets the service standards that the Commission has adopted;
3. The provision of Digital Phone Service in PBT's service area will not adversely impact the availability of affordable local exchange service;
4. TWCIS participates in the support of universally available telephone service at affordable rates through its contributions to the state Universal Service Fund ("USF"); and
5. The provision of Digital Phone Service in PBT's service area will not adversely impact the public interest.

**Q. DESCRIBE YOUR REVIEW OF S.C. CODE ANN. SECTION 58-9-280.**

A. Section 58-9-280 of the Code contains five criteria that applicants may be required to meet in order to obtain authority to offer local service as a telephone utility in South Carolina. I have completed an evaluation of each requirement.

**Q. THE FIRST CRITERION REQUIRES THE APPLICANT TO SHOW THAT IT POSSESSES TECHNICAL, FINANCIAL, AND MANAGERIAL**

**RESOURCES SUFFICIENT TO PROVIDE THE SERVICES  
REQUESTED. HAS TWCIS MET THIS CRITERION?**

A. Yes. TWCIS first applied for a CPCN to provide local service in the service area of AT&T (fka BellSouth) in Docket No. 2003-362-C. In this application, TWCIS submitted evidence that it met the requirements of this criterion. In granting TWCIS's CPCN, the Commission, in Order No. 2004-213, acknowledged that TWCIS possessed the technical, financial, and managerial resources sufficient to provide the services requested.

Since its original request to offer service in South Carolina, TWCIS has provided telecommunications service in the state without any major incidents or outages. Its customer base has grown and TWCIS now serves over [REDACTED] residential and over [REDACTED] business customers in South Carolina with 2007 revenues totaling over \$[REDACTED] million. With this activity TWCIS has demonstrated that it possesses the technical, financial, and managerial resources sufficient to provide the local and long distance service for which it is requesting authority in this filing.

**Q. THE SECOND CRITERION REQUIRES THAT TWCIS'S DIGITAL  
PHONE SERVICE WILL MEET THE SERVICE STANDARDS THAT  
THE COMMISSION MAY ADOPT. HAS TWCIS MET THIS  
CRITERION?**

A. Yes. When TWCIS first applied for a CPCN to provide local service in the service area of AT&T (fka BellSouth) in Docket No. 2003-362-C, it had to

1 provide evidence that it would meet the service standards set by the Commission.  
2 In granting TWCIS's application, the Commission in Order No. 2004-213  
3 acknowledged that TWCIS had committed to meeting the Commission's service  
4 standards. Also, TWCIS has been reporting its quality of service metrics to the  
5 ORS as required by the Commission.

6 **Q. THE THIRD CRITERION CALLS FOR A DEMONSTRATION THAT**  
7 **THE PROVISION OF DIGITAL PHONE SERVICE WILL NOT**  
8 **ADVERSELY IMPACT THE AVAILABILITY OF AFFORDABLE**  
9 **LOCAL EXCHANGE SERVICE. IN YOUR OPINION, HAS TWCIS**  
10 **PROVIDED EVIDENCE THAT THE AFFORDABILITY OF LOCAL**  
11 **EXCHANGE SERVICE IN PBT'S SERVICE AREA WILL NOT BE**  
12 **JEOPARDIZED?**

13 **A.** Yes it has. In Order No. 2004-213, this Commission granted TWCIS a  
14 CPCN allowing the company to provide "competitive, facilities-based intrastate  
15 local and interexchange voice telecommunications services within the State of  
16 South Carolina, subject to the Stipulation between TWCIS and the SCTC."

17 TWCIS has offered compelling support for its claim that the availability of  
18 Digital Phone Service will not cause PBT to raise rates to unaffordable levels.  
19 First, the regulatory flexibility option chosen voluntarily by PBT caps its rates and  
20 limits PBT rate increases for basic local service to no more than the annual  
21 change in the inflation-based index approved by the Commission, Gross Domestic  
22 Product Price Index ("GDP-PI"). Second, PBT has the support of the federal and

1 state USF. Confidential Exhibit CJR-3 illustrates the support PBT receives from  
2 the Federal USF, the South Carolina USF, and the South Carolina Interim LEC  
3 Fund. The data demonstrate that PBT obtains \$■■■ per year or over \$■■■ per  
4 month (\$■■■/mo.) in federal and state support for each of its telephone lines in  
5 operation.

6 Competitive alternatives to PBT local service are already available to  
7 consumers in PBT service area. These competing services, such as wireless  
8 (offered by AT&T, Verizon, Sprint, and PBT Wireless), voice-over-internet  
9 protocol ("VoIP") service like that offered by Vonage, and potentially TWCIS'  
10 Digital Phone Service may be chosen by consumers, and will also help to keep  
11 PBT prices for local service in line with "the market," and thus, "affordable."

12 Furthermore, if revenue losses increase the per line costs on PBT's  
13 remaining local loops then PBT has several options available to resolve the  
14 revenue shortfall:

- 15 1. PBT can increase its revenue per line by offering new and/or more advanced  
16 services over its existing lines;
- 17 2. PBT can reduce its cost by increasing efficiency;
- 18 3. PBT can upgrade its existing network, if necessary, allowing it to offer more  
19 advanced and potentially profitable services;
- 20 4. PBT may be able to request additional federal USF support; or
- 21 5. PBT can request additional state USF support.



1   **Q.    THE FOURTH CRITERION REQUIRES TWCIS TO “PARTICIPATE IN**  
2       **THE SUPPORT OF UNIVERSALLY AVAILABLE TELEPHONE**  
3       **SERVICE AT AFFORDABLE RATES.” HAS TWCIS COMMITTED TO**  
4       **THIS REQUIREMENT?**

5   **A.           Yes. Not only has TWCIS committed to support universal service in this**  
6       **filing, it is currently contributing to the state universal service fund.**

7   **Q.    THE FIFTH CRITERION CALLS FOR A DEMONSTRATION THAT**  
8       **THE PROVISION OF DIGITAL PHONE SERVICE WILL NOT**  
9       **ADVERSELY IMPACT THE PUBLIC INTEREST. IN YOUR OPINION,**  
10      **HAS TWCIS PROVIDED EVIDENCE THAT THE PUBLIC INTEREST IN**  
11      **PBT’S SERVICE AREA WILL NOT BE ADVERSELY IMPACTED?**

12   **A.           Yes. This Commission, in Order No. 2004-213 page 11, has already stated**  
13      **that “authority for TWCIS to provide interexchange and local voice services to be**  
14      **in the public interest and therefore to be in the best interests of the citizens of the**  
15      **State of South Carolina.” The Commission goes on in this Order to state, in its**  
16      **“Conclusions of Law,” that “approval of TWCIS’ Application to provide local**  
17      **exchange telecommunications services and intrastate interexchange**  
18      **telecommunications services within South Carolina will serve the public interest**  
19      **by increasing the level of competition in the South Carolina telecommunications**  
20      **market using a new technology.”**

21                **In my opinion, providing consumers with the option to purchase Digital**  
22      **Phone Service meets the public interest. It offers consumers a wired alternative**

1           for local telephone service. It also offers these consumers a different pricing  
2           scheme for their phone service.

3   **Q.     DOES THIS CONCLUDE YOUR TESTIMONY?**

4   **A.           Yes it does.**

**QUALIFICATIONS & EXPERIENCE  
OF  
CHRISTOPHER J. ROZYCKI**

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**QUALIFICATIONS SUMMARY**

Senior Regulatory Professional - Significant experience creating and implementing regulatory and legislative policy and plans, with a consistent record of delivering outstanding results in areas involving state and federal regulatory and legislative action, and the establishment and implementation of rational and balanced regulatory policies. Created and directed cross-functional leadership and project teams that produce results. Expertise includes budgeting, reorganizations, strategic planning, hiring, training, and policy and process development. Published journal articles and wrote white papers, pamphlets and a variety of other documents. Developed and presented comments and testimony on subjects including: rates; financial, economic and regulatory matters; and industry performance standards and metrics. Appeared before federal and state regulators and legislators, and testified before Public Utility Commissions ("PUCs") in 13 states.

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**EXPERIENCE**

2008 – PRESENT

**SOUTH CAROLINA OFFICE OF REGULATORY STAFF**

Columbia, South Carolina

**MANAGER – TELECOMMUNICATIONS PROGRAMS**

- Perform analysis and provides testimony in formal telecommunications proceedings before the South Carolina Public Service Commission regarding rate applications, CPCNs, tariff filings, interconnection agreements, cost of service and depreciation studies.
  - Plans, coordinates and directs daily operations for telecommunications department. Administer and supervise the state's Universal Service Fund, Interim LEC Fund, and Dual Party Relay Fund.
  - Develops policies and programs that maximize the financial integrity of the state's telecommunications companies while ensuring that they provide quality service at reasonable rates.
  - Collects data and analyzes the technical, statistical and economic trends of telecommunications policy. Writes position papers as required
  - Manage the Lifeline & Linkup program.
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2007 – 2008

**ROCK HILL TELEPHONE COMPANY**  
Rock Hill, South Carolina

**RATES AND TARIFFS ANALYST**

- Developed competitive rate offerings for business customers
- Managed federal and state tariff filings
- Assisted with other regulatory support duties e.g.: assisting with the development of the Comporium Wireless application to participate in the FCC auction of wireless licenses.

2002 – 2007

**TELECOM OPTIMIZATION PARTNERS**  
Charlotte, North Carolina

**PARTNER**

Telecom Optimization Partners is devoted to improving the business operations and profitability of providers and users of telecommunications services.

- Created Business Plans, Financial Models, Investor Presentations, for a startup supplier of an electric utility communications and management system
- Developed investor presentations resulting in \$20 million in venture capital funding offers
- Performed due diligence and M&A research, and provided guidance on industry direction and opportunities for a private investment group and a startup cable system aggregator

2000 – 2002

**CAROLINA BROADBAND, INC.**  
Charlotte, North Carolina

**VICE PRESIDENT, LEGAL AND GOVERNMENT AFFAIRS**

Carolina BroadBand was a Broadband Service Provider ("BSP"), preparing to offer cable TV, telephone, and data services over its own last-mile, fiber optic network in Charlotte, Raleigh, Columbia, and other cities in the Carolinas.

- Performed and managed the complete regulatory startup of the Company and established corporate regulatory policies, reporting regularly to the CEO and Board of Directors.
- Negotiated complex agreements with the City of Charlotte, Duke Power, BellSouth, and others for interconnection, pole attachments, and rights-of-way
- Led the creation of a new industry association, and led the association in educating federal legislators and FCC regulators about critical industry issues.
- Organized and led a special project team for the rollout of telecom services, shaving six months off the time to activate these services
- Established excellent relationships and worked closely with Charlotte City officials to alleviate market entry barriers facing the Company.

1998 – 2000

**ITC^DELTACOM COMMUNICATIONS, INC.**  
Huntsville, Alabama

**DIRECTOR OF GOVERNMENT AFFAIRS**

Recruited to provide policy and managerial leadership to the regulatory department of this competitive telecommunications and data services company. Our Team performed a wide range of tasks covering all aspects of the business including regulatory functions, interconnection agreement negotiations, customer complaint resolution, tariff development, lobbying, and industry relations activities.

- Formulated Company policy on all regulatory issues, coordinating buy-in with the CEO, CFO, General Counsel, CTO, and SVP of Marketing and Sales.
- Crafted strategy and led the Company in a series of PUC complaints and court cases against BellSouth, resulting in an \$80 million victory.
- Assembled and led a multi-disciplinary team of subject matter experts to establish Company policy, then directed this team in negotiating interconnection agreements with BellSouth and other ILECs
- Managed consumer complaint resolution, handling difficult cases requiring executive level decisions
- Testified before state PUCs and PSCs as the Company's policy expert on a wide range of issues including inter-company compensation, industry performance standards, and interconnection agreement issues

1997 – 1998

**TELCOVE**  
Pittsburgh, Pennsylvania

**DIRECTOR OF REGULATORY AFFAIRS**

- Led team in obtaining CLEC certification in 12 states and creating over 40 state and federal tariffs
- Built political support for the Company on the issue of municipal rights-of-way, by educating key officials at the FCC, members of the President's Economic Council, state legislators, state regulators, and governor's offices
- Initiated and organized several industry coalitions that collectively lobbied against RBOC dominance of legislative and regulatory opinion

1983 – 1997

**AT&T**  
Various U.S. Locations

**MANAGEMENT POSITIONS IN BUSINESS DEVELOPMENT, FINANCE & GOVERNMENT AFFAIRS**

- Led team creating the initial business case for TCG; resulting in AT&T's purchase of TCG in January 1998
- Developed financial models for use in new business development projects
- Created new business concept document for broadband growth
- Produced a \$20 million financial turnaround, using rate filings, in one year
- Developed AT&T's policies and positions regarding proposed legislation
- Led interdepartmental teams, coordinating and leading negotiations with Independent Telephone Companies and representing AT&T in formal hearings

- 
- Created educational materials to develop a solid, positive image for “the new AT&T” in PA and NJ. This model was used by the Company nationwide

1972 – 1983

**EARLY CAREER POSITIONS**  
Metropolitan Washington, DC Area

**FAIRFAX COUNTY DEPARTMENT OF CONSUMER AFFAIRS**

**Consumer Advocate, Public Utilities** - Prepared and presented testimony on rate of return and economic issues in electric, gas, and telephone rate cases before the Virginia State Corporation Commission

**TECHNICAL RESEARCH ANALYSIS COMPANY**

**Vice President** - Established an energy and regulatory consulting firm, performing research and analytical projects for the Federal Energy Regulatory Commission (FERC) and the U.S. Department of Energy (DOE).

**U.S. DEPARTMENT OF ENERGY**

**Economist** - Developed and performed new, rigorous studies assessing the economic feasibility of energy efficiency regulations and developed energy price forecasts.

**PUBLIC UTILITY CONSULTING**

**Economist** – Research Economist for two Washington, DC based public utility consulting firms. Performed research in public utility regulation, and prepared cost of capital, cost allocation, and rate design studies in support of the company’s public utility consulting projects and for use in public utility rate cases

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**EDUCATION**

- MA, Economics, George Mason University, 1978
- BA, Economics, Georgetown University, 1972

**TESTIMONY & FILINGS OF CHRISTOPHER J. ROZYCKI**

**“Comments On the Status of Competition in the Market for the Delivery of Video Programming,”** Submitted to the Federal Communications Commission, CS Docket No. 01-129, on behalf of Carolina BroadBand, Inc., August 3, 2001.

**“Testimony Requesting Immediate Implementation of Performance Measures and Enforcement Mechanisms for BellSouth to Support the Development of Competition in Georgia,”** Submitted to the Georgia Public Service Commission, Docket No. 7892-U, Prepared for ITC^DeltaCom Communications Inc., June 20, 2000.

**“Testimony Regarding ITC^DeltaCom’s Petition for Arbitration With BellSouth Pursuant to the Telecommunications Act of 1996”**

- Submitted to the Georgia Public Service Commission, Docket No. 10854-U, Prepared for ITC^DeltaCom Communications Inc., November 15, 1999.
- Submitted to the Tennessee Regulatory Authority, Docket No. 99-00430, Prepared for ITC^DeltaCom Communications Inc., October 22, 1999.
- Submitted to the Louisiana Public Service Commission, Docket No. U-24206, Prepared for ITC^DeltaCom Communications Inc., September 3, 1999.
- Submitted to the Florida Public Service Commission, Docket No. 990750-TP, Prepared for ITC^DeltaCom Communications Inc., August 16, 1999.
- Submitted to the South Carolina Public Service Commission, Docket No. 1999-259-C, Prepared for ITC^DeltaCom Communications Inc., August 11, 1999.
- Submitted to the Alabama Public Service Commission, Docket No. 27091, Prepared for ITC^DeltaCom Communications Inc., June 14, 1999.
- Submitted to the North Carolina Utilities Commission, Docket No. P-500 Sub 10, Prepared for ITC^DeltaCom Communications Inc., June 14, 1999.

**“Testimony Regarding ITC^DeltaCom’s Complaint Against BellSouth For Breach of Interconnection Terms, and Request for Immediate Relief (Payment of Reciprocal Compensation for ISP-Bound Traffic),”** Submitted to the South Carolina Public Service Commission, Docket No. 1999-033-C, Prepared for ITC^DeltaCom Communications Inc., August 18, 1999.

**“Testimony Regarding the Emergency Petition of ITC^DeltaCom for Declaratory Ruling Enforcing Certain Terms of Its Interconnection Agreement With BellSouth (Payment of Reciprocal Compensation for ISP-Bound Traffic),”** Submitted to the Alabama Public Service Commission, Docket 26619, Prepared for ITC^DeltaCom Communications Inc., August 24, 1998.

**“Testimony Regarding The Commission Investigation Into How The Revenues Generated By The Lease of Dark Fiber Are Subject to the UAF Contribution Requirements,”**

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Submitted to the Georgia Public Service Commission, Docket No. 8787, Prepared for ITC^DeltaCom Communications Inc., April 13, 1998.

**“Testimony Regarding the Request of Bell Atlantic - New York for Permission to Provide InterLATA Telecommunications Service,”** Submitted to the New York Public Service Commission, Case No. 97-C-0271, Prepared for Hyperion Telecommunications Inc., December 3, 1997. (Hyperion was renamed Adelphia Business Solutions, and then renamed again - TelCove)

**“Testimony Regarding the Petition of New England Telephone and Telegraph Company d/b/a Bell Atlantic Vermont for Approval of a Price Regulation Plan Pursuant to 30 V.S.A. § 226b,”** Submitted to the Vermont Public Service Board, Docket No. 6000, Prepared for Hyperion Telecommunications Inc., 1997.

**“Testimony Regarding Hyperion’s Position on Service Quality Standards for Local Exchange Companies Providing Telecommunications Service in Vermont,”** Submitted to the Vermont Public Service Board, Docket No. 5903, Prepared for Hyperion Telecommunications Inc., May 28, 1997.

**“Testimony Supporting the Application of Entergy Hyperion Telecommunications of Mississippi, LLC, for a Certificate of Public Convenience and Necessity for Authority to Provide Local Exchange and Interexchange Telecommunications Services in the State of Mississippi,”** Submitted to the Mississippi Public Service Commission, Docket No. 97-UA-296, Prepared for Hyperion Telecommunications Inc., May 15, 1997.

**“Testimony Regarding the Regulation of ILECs and CLECs Providing Local Telecommunications Service in Vermont,”** Submitted to the Vermont Public Service Board, Docket No. 5713, Prepared for Hyperion Telecommunications Inc., April 8, 1997.

**“Testimony and Exhibits Regarding the Access Charges of the Commonwealth Telephone Company,”** Submitted to the Pennsylvania Public Utility Commission, Docket No. I-00920020, Prepared for AT&T, July 19, 1993.

**“Testimony and Exhibits In the Matter of the Diamond State Telephone Company's Application For a Rate Increase,”** Submitted to the Delaware Public Service Commission, Docket No. 92-47, Prepared for AT&T, January 18, 1993.

**“Testimony and Exhibits Regarding the Access Rates of 37 Local Exchange Companies,”** Submitted to the Pennsylvania Public Utility Commission, Docket No. I-910010, Prepared for AT&T, October 2, 1992.

**“Testimony Regarding the Application of the Chesapeake and Potomac Telephone Company of Virginia for Authority to Increase and Restructure Its Rates for Intrastate Communications Services,”** Submitted to the State Corporation Commission of the Commonwealth of Virginia, Case No. PUC 830029, on behalf of The Board of Supervisors of Fairfax County Virginia, November 2, 1983.

**“Testimony Regarding the Application of Virginia Electric and Power Company for an Increase in Rates,”** Submitted to the State Corporation Commission of the Commonwealth of



Virginia, Case No. PUE 830029, on behalf of The Board of Supervisors of Fairfax County Virginia, June 30, 1983.

**“Testimony Regarding the Application of the Chesapeake and Potomac Telephone Company of Virginia for an Increase in Rates,”** Submitted to the State Corporation Commission of the Commonwealth of Virginia, Case No. PUC 820020, on behalf of The Board of Supervisors of Fairfax County Virginia, January 5, 1983.

**“Testimony Regarding the Application of Washington Gas Light Company for an Increase in Rates,”** Submitted to the State Corporation Commission of the Commonwealth of Virginia, Case No. PUE 820029, on behalf of The Board of Supervisors of Fairfax County Virginia, November 22 1982.

**“Testimony Regarding the Application of the Continental Telephone Company of Virginia for an Increase in Rates,”** Submitted to the State Corporation Commission of the Commonwealth of Virginia, Case No. PUC 820011, on behalf of The Board of Supervisors of Fairfax County Virginia, October 27, 1982.

**CONFIDENTIAL**

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2008-328-C**

IN RE:	)	
Application of Time Warner Cable Information	)	<b>CERTIFICATE OF</b>
Services (South Carolina), LLC d/b/a Time	)	<b>SERVICE</b>
Warner Cable to Amend Its Certificate of Public	)	
Convenience and Necessity to Provide Telephone	)	
Services in the Service Area of PBT Telecom, Inc	)	
and for Alternative Regulation	)	

This is to certify that I, Chrystal L. Morgan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **MOTION FOR CONFIDENTIAL TREATMENT, TESTIMONY, AND EXHIBITS OF CHRISTOPHER J. ROZYCKI** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

M. John Bowen Jr., Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, SC, 29211

Bonnie D. Shealy, Esquire  
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Robinson, McFadden & Moore, P.C.  
Post Office Box 944  
Columbia, SC, 29202

C. Bradley Hutto, Esquire  
Williams & Williams  
Post Office Box 1084  
Orangeburg, SC, 29115

  
Chrystal L. Morgan

December 9, 2008  
Columbia, South Carolina